

Kenneth A. Gallo (*pro hac vice*)
Joseph J. Simons (*pro hac vice*)
Craig A. Benson (*pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
2001 K Street, NW
Washington, DC 20006-1047
Telephone: (202) 223-7300
Facsimile: (202) 204-7420
Email: kgallo@paulweiss.com
Email: jsimons@paulweiss.com
Email: cbenson@paulweiss.com

Stephen E. Taylor (SBN 058452)
Jonathan A. Patchen (SBN 237346)
TAYLOR & COMPANY LAW OFFICES, LLP
One Ferry Building, Suite 355
San Francisco, California 94111
Telephone: (415) 788-8200
Facsimile: (415) 788-8208
Email: staylor@tcolaw.com
Email: jpatchen@tcolaw.com

*Attorneys for Plaintiffs Sharp Electronics Corporation and
Sharp Electronics Manufacturing Company of America, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-cv-05944 (JST)
MDL No. 1917

This Document Relates to:

All DAP Actions

*Crago, d/b/a Dash Computers, Inc. et al. v.
Mitsubishi Electric Corporation, et al., Case
No. 14-CV-2058-JST*

**DECLARATION OF CRAIG A. BENSON
IN SUPPORT OF STIPULATION AND
[PROPOSED] ORDER EXTENDING THE
DATE TO SUBMIT TRANCHE 2
OBJECTIONS TO THE SPECIAL
MASTER**

Judge: Hon. Jon S. Tigar

1 I, Craig A. Benson, hereby declare as follows:

2 1. I am a Partner with the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP,
3 counsel for Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of
4 America, Inc. I am a member of the bars of the State of Maryland, the State of New York, and the
5 District of Columbia, and on March 20, 2013, I was granted leave to appear *pro hac vice* in this
6 litigation.

7 2. I submit this Declaration in support of the Direct Action Plaintiffs, Direct Purchaser
8 Plaintiffs, and Defendants' (collectively, "the parties") Stipulation and [Proposed] Order Extending the
9 Time to Submit Tranche 2 Objections to the Special Master, Pursuant to Civil Local Rules 6-2 and 7-12.
10 I have personal knowledge of the matters set forth herein and, if called as a witness, I could and would
11 testify competently to them.

12 3. Attached as Exhibit A is a true and correct copy of a letter from the parties to the
13 Special Master, dated May 2, 2016, regarding the translation-objection resolution protocol for *In re CRT*
14 *Antitrust Litigation*, MDL No. 1917, No. 07-cv-5944-JST.

15 4. On April 25, 2016, Special Master Walker issued a Report and Recommendation
16 ("R&R") regarding a Translation-Objection Protocol, which established two rounds of coordinated
17 objections with respect to foreign-language documents. *See* ECF No. 4597. The R&R ordered that the
18 parties submit letter briefs in connection with their second round ("Tranche 2") coordinated objections
19 no later than June 14, 2016, with responses due not later than June 22, 2016. *See id.* at 5.

20 5. On May 2, 2016, the parties wrote to Special Master Walker explaining that they
21 would exchange lists of Tranche 2 objections on May 2, and expected to crystalize their respective
22 positions on those Tranche 2 objections by June 15, 2016. *See* Benson Decl. Ex. A, at 3. Accordingly,
23 the parties proposed jointly submitting Tranche 2 coordinated objections to Special Master Walker on
24 June 24, 2016. *See id.* On May 3, 2016, Special Master Walker issued a second R&R, modifying the
25 submission date for the Tranche 2 coordinated objections to June 24, 2016. *See* ECF No. 4625, at 2.
26 This represents the first and only time modification in this action for the deadline for the parties to
27 submit Tranche 2 coordinated objections.

6. Also on May 2, 2016, the parties exchanged their lists of Tranche 2 coordinated objections. The combined total of objections identified by the parties for Tranche 2 is substantially larger than the number of objections in the first round (“Tranche 1”) of translation objections.

7. On May 23, 2016, this Court issued an Order adopting ECF No. 4597, as modified by ECF No. 4625. *See* ECF No. 4657.

8. The parties have been working diligently to crystalize their positions on the Tranche 2 objections. In light of the large volume of Tranche 2 objections, and given the parties’ recent experience in being able to resolve a substantial number of Tranche 1 objections through bilateral exchanges and the meet-and-confer process, the parties believe that additional time is necessary and will be beneficial in allowing the parties to narrow the universe of objections prior to submitting their final positions to the Special Master.

9. The parties believe that an extension until July 20, 2016, to submit their coordinated objections for Tranche 2 will be sufficient.

10. The requested time modification will not have any effect on the schedule of dates for this case.

11. After the parties agreed to the initial Tranche 2 submission date of June 24, 2016, the Court issued its Order Setting Trial Schedule on May 5, 2016, which moved the date of the first trial from September 6, 2016, to January 9, 2017. *See* ECF No. 4628. The first trial date remains January 9, 2017, after the Court’s Case Management Order, issued on May 24, 2016. *See* ECF No. 4658.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed this 2nd day of June, 2016, in Washington, DC.

/s/ Craig A. Benson

Craig A. Benson